

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

**XIAOTIAN LIU,**

**Plaintiff,**

**v.**

**KRISTI NOEM**, Secretary of the Department  
of Homeland Security;

**TODD LYONS**, Acting Director of the  
Immigration and Customs Enforcement;

**Defendants.**

**No.** \_\_\_\_\_

**PLAINTIFF’S MOTION FOR TEMPORARY RESTRAINING ORDER**  
**(ORAL ARGUMENT REQUESTED)**

Pursuant to Fed. R. Civ. P. 65 and Section 705 of the Administrative Procedure Act, 5 U.S.C. § 705, and Counts 1 and 2 of Plaintiff’s Complaint for Declaratory and Injunctive Relief—and for the reasons stated in the accompanying memorandum, declarations, and all pleadings filed—Plaintiff respectfully moves this Court to issue a temporary restraining order (i) enjoining Defendants from terminating Plaintiff’s F-1 student status under the Student and Exchange Visitor (SEVIS) system and (ii) requiring Defendants to set aside their termination determination. The grounds for this motion are set forth in Plaintiff’s accompanying memorandum of law in support of his motion.

Plaintiff also moves this Court for an order waiving the requirement for bond or security.

Xiaotian Liu,

By and through his Counsel,

/s/ SangYeob Kim

Gilles R. Bissonnette (NH Bar: 265393)

Henry Klementowicz (NH Bar: 21177)

SangYeob Kim (NH Bar: 266657)

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Date: April 7, 2025

**CERTIFICATE OF SERVICE**

I hereby certify that on April 7, 2025, a true and exact copy of the foregoing was served via email upon Defendants' counsel as follows:

Rob Rabuck, Assistant United States Attorney

Rob.Rabuck@usdoj.gov

Dated: April 7, 2025

Respectfully submitted,

/s/ SangYeob Kim

SangYeob Kim (NH Bar: 266657)